

Robert T. Mills (Arizona Bar #018853)
Sean A. Woods (Arizona Bar #028930)
MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
Telephone 480.999.4556
docket@millsandwoods.com
swoods@millsandwoods.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Sean Bennett, an individual,
Plaintiff,

vs.

City of Phoenix, a governmental entity;
American Airlines, Inc., a foreign
corporation; Officer Joel Cottrell and Jane
Doe Cottrell, a married couple; Officer
Benjamin Denham and Jane Doe Benham,
a married couple; Officer Todd Blanc and
Jane Doe Blanc, a married couple; Officer
Peru and Jane Doe Peru, a married couple;
Sergeant Hogan and Jane Doe Hogan, a
married couple,
Defendants.

No.: CV-23-02425-PHX-ROS (DMF)

**STIPULATED MOTION TO
EXTEND DEADLINES**

(Fifth Request)

(Assigned to the Honorable Roslyn O.
Silver and referred to the Honorable
Deborah M. Fine for all pretrial
proceedings)

Through counsel undersigned and pursuant to Rule 7.3 of the Local Rules of Civil Procedure, the parties hereby stipulate, agree, and respectfully move, to extend all existing deadlines in this action by approximately ninety days each, in accordance with the [Proposed] Order attached hereto.

Good cause exists for such extension. As a preliminary matter, the parties are cognizant of the current deadlines and that this Court has previously admonished the parties that it is not inclined to grant further extensions. The parties come to this Court

1 acknowledging this and avow that this request is not taken lightly. The parties will not
2 make another request for extensions. The parties have been in constant communication and
3 have worked together to obtain all discovery possible. Despite the parties' efforts and
4 multiple requests, the VA medical facility in Alaska still has not produced medical records
5 and billings. Moreover, scheduling additional and needed depositions has proved
6 extremely difficult due to deponents' work schedules and conflicts with counsels'
7 schedules – as well as not having pertinent discovery. To illustrate – Defendants' counsel
8 has three jury trials through the end of this year still to complete. Plaintiff's counsel has a
9 trial and briefing before the U.S. Supreme Court to complete, has his own trial in
10 December, and recently had an oral argument before the Ninth Circuit.

11
12 The extra time requested is necessary not only to properly finalize discovery, but
13 also to allow both sides' experts the opportunity to review all relevant materials, documents
14 which despite diligent and consistent effort have not yet been obtained.

15
16 For all the foregoing reasons, the parties submit that good cause exists for existing
17 deadlines in this matter to be extended as follows:

- 18
19 1. The last day to commence lay depositions, from October 1, 2025 to **January**
20 **2, 2026;**
- 21
22 2. The last day to complete fact discovery, from October 8, 2025 to **January 7,**
23 **2026;**
- 24
25 3. The last day for Plaintiff to serve full and complete expert disclosures, from
26 October 29, 2025 to **January 28, 2026;**

1 4. The last day to engage in good faith settlement talks, from November 12,
2 2025 to **February 11, 2026**;

3 5. The last day to file Joint Report on settlement talks, from November 18, 2025
4 to **February 18, 2026**;

5 6. The last day for Defendant to serve full and complete expert disclosures,
6 from November 24, 2025 to **February 24, 2026**;

7 7. The last day to serve rebuttal expert disclosures, from December 10, 2025 to
8 **March 11, 2026**;

9 8. The last day to complete expert discovery, from January 14, 2026 to **April**
10 **15, 2026**, and;

11 9. The last day to file dispositive or Daubert motions, from February 6, 2026 to
12 **May 7, 2026**.

13
14
15 **RESPECTFULLY SUBMITTED** this 3rd day of October 2025.

16
17
18
19 **MILLS + WOODS LAW, PLLC**

20
21 By /s/ Sean A. Woods
22 Robert T. Mills
23 Sean A. Woods
24 5055 N 12th Street, Suite 101
25 Phoenix, AZ 85014
26 *Attorneys for Plaintiff*
27
28

**WILSON, ELSER, MOSKOWITZ, EDELMAN &
DICKER LLP**

By /s/ Sarena Kustic (w/ permission)
Sarena Kustic
2231 E Camelback Rd., Ste. 200
Phoenix, Arizona 85016
*Attorneys for Defendant American Airlines
Group, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Patrick J. Kearns, Esq.

Patrick.Kearns@wilsonelser.com

Taylor Allin, Esq.

Taylor.Allin@wilsonelser.com

Sarena Kustic, Esq.

Sarena.Kustic@wilsonelser.com

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

katelyn.kingsley@wilsonelser.com

ashlynn.robbins@wilsonelser.com

emilee.staley@wilsonelser.com

2231 E Camelback Rd., Ste. 200

Phoenix, Arizona 85016

*Attorneys for Defendant American Airlines
Group, Inc.*

/s/ Ben Dangerfield